



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 7, 2021

**REQUEST TO BE FILED EX PARTE AND UNDER SEAL – BY EMAIL**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **United States v. Robert Hadden,**  
**20 Cr. 468 (RMB)**

Dear Judge Berman:

The Government respectfully submits this *ex parte* letter regarding the status of the Government's ongoing investigation of the defendant, in order to provide the Court with information that may be relevant to any scheduling-related discussions that may take place at tomorrow's conference. The Government intends to seek a Superseding Indictment charging the defendant with one additional count of enticement, in violation of 18 U.S.C. §§ 2422(a) and 2, in connection with the defendant's sexual abuse of one additional adult victim ("Victim-6"). The Government has already produced discovery relating to Victim-6 and does not anticipate that the Superseding Indictment will affect the Government's discovery productions or the trial date, which is scheduled for January 5, 2022. With respect to timing, because of the COVID-19 pandemic, grand juries in this District have limited availability. The Government is on the waitlist for grand jury time on July 14, 2021 and July 19, 2021, and has reserved grand jury time on July 26, 2021.

[REDACTED]

The Government has not provided the above information to the defense given the secrecy of grand jury proceedings under Federal Rule of Criminal Procedure 6(e) and the need to protect the interests of victim witnesses. The Government intends to file this letter with the second paragraph redacted after the return of the Superseding Indictment, but requests that in the interim this letter be filed under seal in light of its discussion of an ongoing grand jury investigation.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

by: /s/  
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